1	DEBRA A. DIIORIO					
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5	Attorneys for Defendant Cunningham (Martin)					
6	UNITED STATES DISTRICT COURT					
7	SOUTHERN DISTRICT OF CALIFORNIA					
8	(HONORABLE LOUISA S. PORTER)					
9						
10	UNITED STATES OF AMERICA,) Criminal Case No. 08-CR-0286-BTM					
11	Plaintiff,)					
12	v.) JOINT MOTION TO CONTINUE					
13	MARTIN CUNNINGHAM Defendant. MODIFY BOND CONDITIONS					
14						
15	IT IS HEREBY REQUESTED by the parties in the case, defendant Martin					
16	Cunningham, by and through his counsel, DEBRA A. DiIORIO, and the United States					
17	Attorney's Office, by and through Assistant United States Attorney RANDY JONES, that the					
18	bond conditions in the above-entitled case be modified by deleting the curfew condition in					
19	order to allow Mr. Cunningham to work during the evening hours. Pretrial Services has been contacted and has authorized the parties to represent that Mr. Cunningham is in full					
20						
21	compliance with all conditions of his bond; further, he has been granted temporary					
22	permission by his pretrial services officer to work during the hours of curfew without					
23	incident for the past two weeks. Both sureties, Juan Sandoval and Ambar Jinesta, have					
24	consented in writing to the proposed modification. A proposed order with respect to this joint					
25						
26	motion is being submitted directly to the court.					
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	Case 3:08-cr-00286-BTM	Document 35	Filed 04/22/2008	Page 2 of 3		
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5	Date: April 22, 2008 s/ Randy Jones RANDY JONES					
6		RANDY JONES Assistant United States Attorney				
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8	Date: <u>April 22, 2008</u>	DEBRA A. DIIORIO				
9		Dilorio & H Attorneys for	all, APC r Defendant			
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Document 35

Filed 04/22/2008

Page 3 of 3

Case 3:08-cr-00286-BTM

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